

PHILLIP A. TALBERT
United States Attorney
JESSICA DELANEY
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHAN JAMES EVANOVICH AND
JONATHAN CURL

Defendants.

CASE NO. 2:24-CR-0079-TLN

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: July 11, 2024
TIME: 9:30 a.m.
COURT: Hon. Troy L. Nunley

STIPULATION

1. By previous order, this matter was set for status on July 11, 2024.
2. By this stipulation, defendants now move to continue the status conference until November 7, 2024, at 9:30 a.m., and to exclude time between July 11, 2024, and November 7, 2024, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the initial discovery associated with this case includes more than 13,000 pages of discovery consisting of investigative reports, financial documentation, phone extractions, photographs, and other documentary evidence, in addition to emails, audio and video recordings, and inventories. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.

b) As of the last court filing, the government has continued its investigation,

1 resulting in the execution of an additional search warrant and corresponding additional
2 discovery. Over 200 pages of new discovery, consisting of documentation from a shipping
3 company, reports of witness interviews, and the results of several searches along with an
4 underlying search warrant are being processed and will be provided to the defense shortly.

5 c) Counsel for defendants Evanovich and Curl desire additional time to review
6 discovery, research the charges and potential defenses, conduct independent investigation, and
7 consult with their clients.

8 d) Counsel for defendants believe that failure to grant the above-requested
9 continuance would deny them the reasonable time necessary for effective preparation, taking into
10 account the exercise of due diligence.

11 e) The government does not object to the continuance.

12 f) Based on the above-stated findings, the ends of justice served by continuing the
13 case as requested outweigh the interest of the public and the defendant in a trial within the
14 original date prescribed by the Speedy Trial Act.

15 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
16 et seq., within which trial must commence, the time period of July 11, 2024 to November 7,
17 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
18 T4] because it results from a continuance granted by the Court at defendant's request on the basis
19 of the Court's finding that the ends of justice served by taking such action outweigh the best
20 interest of the public and the defendant in a speedy trial.

21 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
22 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
23 must commence.

24 IT IS SO STIPULATED.

25 //

26 //

27 //

28 //

1 Dated: July 3, 2024

2 PHILLIP A. TALBERT
3 United States Attorney

4 /s/ JESSICA DELANEY
5 JESSICA DELANEY
6 Assistant United States Attorney

7 Dated: July 3, 2024

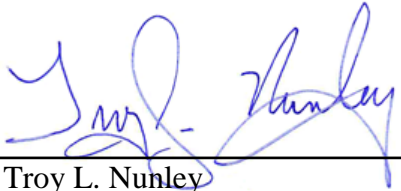
8 /s/ CHRISTINA SINHA
9 CHRISTINA SINHA
10 Counsel for Defendant
11 Stephan James Evanovich

12 Dated: July 3, 2024

13 /s/ KELLAN PATTERSON
14 KELLAN PATTERSON
15 Counsel for Defendant
16 Jonathan Curl

17 **ORDER**

18 IT IS SO FOUND AND ORDERED this 3rd day of July, 2024.

19 
20 Troy L. Nunley
21 United States District Judge
22
23
24
25
26
27
28